

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MONIQUE ELLINGTON
WILLIE PERKINS

(Name and Address of Defendant)

JUDGES COPY
FILED

DEC 17 2007
12-17-07
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

MAGISTRATE JUDGE SCHENKIER
CRIMINAL COMPLAINT

CASE NUMBER 07CR 0846

I, Special Agent Nikkole Robertson, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about December 14, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,
defendants:

did take and carry away, with intent to steal and purloin, approximately \$17,804 in United States Currency belonging to and in the care, custody, control, management, and possession of Diamond Bank, 100 West North Avenue, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation in violation of Title 18 United States Code, Sections 2113(b) and 2.

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHED.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Nikkole Robertson, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 17, 2007
Date

at Chicago, Illinois
City and State

Sidney Schenkier, U.S. Magistrate Judge
Name & Title of Judicial Officer

Sidney I. Schenkier
Signature of Judicial Officer

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

AFFIDAVIT

I, Nikkole Robertson, being duly sworn under oath, state as follows:

Introduction

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for three years. I am assigned to the FBI's Chicago Field Office, Violent Crimes Task Force ("VCTF"). My duties on the VCTF include the investigation of various violent crimes, including bank robbery and incidental crimes in violation of 18 U.S.C. § 2113(b). Prior to my employment with the FBI, I was a police officer for more than five years with the Sauk Village, Illinois Police Department.

2. I make this affidavit from personal knowledge based upon my participation in this investigation, reports I have read related to this investigation, conversations I have had with others who have knowledge of the events and circumstances described herein, interviews of bank employees, and surveillance video and photographs.

3. The information below is provided for the limited purpose of establishing probable cause in support of a criminal complaint against MONIQUE ELLINGTON and WILLIE PERKINS and sets forth only those facts I believe are necessary to establish probable cause. This affidavit is not a complete statement of all that I know about this investigation or the events described herein.

Robbery of Diamond Bank

4. On December 14, 2007, at approximately 8:33 a.m., Diamond Bank ("Bank"), a financial institution whose deposits were then insured by the Federal Deposit Insurance Corporation ("FDIC"), located at 100 West North Avenue, Chicago, Illinois, was robbed by one black male with the assistance of and planning done by bank teller MONIQUE ELLINGTON and her boyfriend, WILLIE PERKINS.

5. According to the teller, MONIQUE ELLINGTON, the robber, a black male, wearing a black, brown and white fur jacket approached ELLINGTON and handed her a note which read, "Give me cash slowly strapps P.S. Thanks."

6. ELLINGTON gave the male all of the cash from her teller drawer, which included all of ELLINGTON's surplus of cash that tellers keep on hand and is to be used when the teller drawer becomes low.

7. The male placed the cash provided by ELLINGTON into his jacket pockets and exited the Bank.

8. After the male was outside of the Bank, ELLINGTON alerted other employees as to what occurred. The Bank's security guard exited the Bank and began running after the male. The security guard did not catch the male.

9. According to witnesses, the male was seen entering a parked, dirty gray Pontiac vehicle with a rear spoiler. Surveillance cameras in the area of the getaway vehicle captured images of the vehicle and the robber getting into the car.

10. According to the Bank's security guard, on December 14, 2007, ELLINGTON had been dropped off for work at approximately 8:30 am by her boyfriend, WILLIE PERKINS, in ELLINGTON's gray 2003 Pontiac with a rear spoiler.

11. According to the Bank's audit, the loss resulting from the robbery is approximately \$17,804.00.

Monique Ellington

12. After the December 14, 2007 robbery, ELLINGTON agreed to assist the FBI in locating the robber by placing a recorded call to WILLIE PERKINS demanding that he find out who used her vehicle to rob Diamond Bank. ELLINGTON demanded that PERKINS get the Bank's money back. PERKINS told ELLINGTON that he needed some time. ELLINGTON asked PERKINS where the person to whom he loaned her vehicle was located. PERKINS told ELLINGTON that person lived on the west side of Chicago, near Ferdinand and Springfield.

Location of Willie Perkins

13. On December 14, 2007, at approximately 3:20 p.m., ELLINGTON's vehicle was observed by a member of the VCTF outside PERKINS' home, 16001 South Debbie Lane, South Holland, Illinois.

14. Members of the VCTF observed and followed PERKINS as he left his residence in ELLINGTON's vehicle and drove to 458 Springfield, Chicago, Illinois, an address located near Ferdinand and Springfield Streets. PERKINS entered the residence and

stayed for a short time. PERKINS exited the residence, entered ELLINGTON's vehicle and drove away. A traffic stop on PERKINS was conducted by members of the VCTF. PERKINS immediately advised VCTF members that the cash from the robbery was in the center console of the vehicle.

15. \$4,179.00 was recovered from the center console of ELLINGTON's vehicle.

Interview of Willie Perkins

16. FBI Agents met with PERKINS and advised PERKINS of his *Miranda* rights, which he waived and agree to be interviewed. PERKINS told agents that the night before the robbery, ELLINGTON had suggested a plan to rob Diamond Bank. PERKINS told ELLINGTON that he could find someone to commit the robbery. The morning of the robbery, PERKINS and ELLINGTON drove to PERKINS' friend NICK's (last name unknown) house on Dobson Street in South Holland. PERKINS and ELLINGTON spoke with NICK LNU and asked him if he wanted to get involved with the robbery. NICK agreed and drove with PERKINS and ELLINGTON to Chicago in ELLINGTON's vehicle. While traveling to Chicago, all three discussed the plans to rob the Bank. NICK, PERKINS and ELLINGTON stopped at the JEWEL store in Chicago near Diamond Bank. ELLINGTON went inside JEWEL and purchased a drink, a hat and gloves. According to PERKINS, the hat and gloves were for NICK to wear during the robbery. NICK wore the hat, but did not wear the gloves. PERKINS initially wrote the robbery note, but ELLINGTON felt that it looked too much like his handwriting so NICK wrote the note instead.

17. Before arriving at Diamond Bank to drop ELLINGTON off for work, PERKINS dropped NICK off near the Bank. PERKINS then took ELLINGTON to Diamond Bank for work. PERKINS then drove back to where he had dropped off NICK. The original plan was for ELLINGTON to give PERKINS a call indicating the appropriate time to proceed and, to that end, PERKINS was to keep ELLINGTON's cellular telephone. However, ELLINGTON forgot to leave the phone with PERKINS. NICK waited with PERKINS for a few minutes and then began to walk toward the Bank. PERKINS waited in the vehicle for NICK. Approximately five or ten minutes later NICK ran to the car where PERKINS was waiting. PERKINS and NICK drove away and went to the hotel where he and ELLINGTON had stayed the previous night. NICK counted the cash and gave PERKINS about thirty percent of the proceeds. PERKINS then took NICK to 87th Street near the Dan Ryan expressway and dropped him off. PERKINS then received a call from ELLINGTON asking him to get the money back. PERKINS went to Ferdinand and Springfield to meet with NICK, and NICK gave PERKINS back a portion of the robbery proceeds.

Interview of Monique Ellington

18. After agents interviewed PERKINS, they read ELLINGTON her *Miranda* rights and re-interviewed her. ELLINGTON stated PERKINS had spoke of robbing Diamond Bank a few days prior to the robbery. ELLINGTON stated the plans and details of the robbery were discussed the night before the robbery while she and PERKINS stayed

in a hotel. ELLINGTON stated the morning of the robbery, she and PERKINS picked up PERKINS' friend whom she had never met before. ELLINGTON discussed the plans to rob the Bank with PERKINS and the male. The plan was for the male to use a note during the robbery. ELLINGTON provided the layout of the Bank. When the male entered the bank, he approached ELLINGTON and handed her the note. ELLINGTON then gave the male cash from her teller drawer, including all of her surplus cash.

19. Based on the foregoing information, I respectfully submit that there is probable cause to believe that MONIQUE ELLINGTON and WILLIE PERKINS did take and carry away, with intent to steal and purloin, money from Diamond Bank, 100 West North Avenue, Chicago, Illinois, in the amount of approximately \$17,804.00 in United States currency belonging to and in the care, custody, control, management, and possession of Diamond Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Sections 2113(b) and 2.

FURTHER AFFIANT SAYETH NOT.

Nikkole E. Robertson, Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME
this 17th day of December 2007

Sidney I. Schechter

UNITED STATES MAGISTRATE JUDGE